Before the
FEDERAL TRADE COMMISSION
Washington, DC 20580

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COMMENTS OF THE
CONSUMER ELECTRONICS ASSOCIATION
ON

Energy Labeling Workshop – Project No. P064201

Introduction

The following comments are submitted on behalf of the Consumer Electronics Association (CEA) in response to the Commission's request for public input on current energy labeling requirements. In particular, CEA would like to respond to the request for comments on whether the Commission should revisit its decision to exclude televisions from its labeling requirements and whether the existing U.S. Department of Energy (DOE) test procedures are an appropriate basis for labeling.

CEA represents more than 2,000 companies involved in the design, development, manufacturing, distribution and integration of audio, video, in-vehicle electronics, wireless and landline communications, information technology, home networking, multimedia and accessory products, as well as related services that are sold through consumer channels. CEA also produces the nation's largest annual trade event, the International Consumer Electronics Show.

Energy Star already drives measurable energy efficiency improvements and provides a strong signal to consumers concerned about energy use.

The consumer electronics industry is a strong supporter of the voluntary, market-driven and national approach to saving energy represented by the federal Energy Star program. This successful joint government-industry partnership, which benefits from strong participation by manufacturers, captures a broad range of consumer electronics, including televisions. The program creates a competitive incentive for energy savings without compromising industry innovation or consumer choice. The Energy Star program provides consumers with the products and features they demand, along with a logo recognized by almost two-thirds of consumers.[1] In addition, many government procurement specifications require the purchase of Energy Star products. The widespread use of this market-driven program promotes energy efficiency and has resulted in significant energy savings and reduced greenhouse gas emissions. In 2005,

[1] Public awareness of Energy Star has jumped to 64 percent of U.S. households, according to a nationwide survey released by the U.S. Environmental Protection Agency on February 23, 2005.

over 43% of digital televisions shipped to dealers were Energy Star compliant, according to CEA market research.

In the U.S. and internationally, voluntary initiatives, such as Energy Star, have a proven record of success in addressing energy efficiency in the highly competitive and dynamic consumer electronics market. Agreements to promote certain Energy Star qualified products have been established with government agencies in various countries and regions, including Australia, Canada, the European Union, Japan, New Zealand and Taiwan.[2] The international adoption of the Energy Star program is further evidence of the effectiveness of voluntary, market-oriented approaches to energy efficiency for televisions and other consumer electronics products.

With respect to televisions, the Energy Star program to date has focused on standby mode power consumption. However, the U.S. Environmental Protection Agency has announced its intention to expand the program to address active mode power consumption. Digital televisions are already being considered within the Energy Star program.

Standard ways of measuring the energy use of digital televisions are a necessary first step.

A standard way of measuring the energy use of a product is a necessary first step before any consumer information program can be promoted –including Energy Star. Statements about the energy use of digital televisions cannot be adequately substantiated at this time since there is no acceptable standard test method in place. Current DOE test procedures, which were intended for black-and-white analog televisions, are entirely inappropriate for measuring the energy use of digital televisions. The consumer electronics industry is already developing a new standard test method for measuring the energy use of digital televisions. The initiative, hosted by the International Electrotechnical Commission (IEC), is international in scope and benefits from participation by various stakeholder groups. The project, intended to meet industry and regulatory demand for a neutral, non-biased, reproducible, international measurement technique for the energy use of televisions, will address all types of display technology. Furthermore, the stakeholders, through participation in their national IEC committees, aim to complete this standard in an expeditious manner in order to promote energy savings, support voluntary programs, and meet public and private sector interest in facilitating an accurate comparison of the energy consumption of TVs that use disparate display technologies.

Electronics are dramatically different from the products currently subject to the Commission's "Appliance Labeling Rule."

For consumer electronics, the Commission should recognize that the greatest gains in energy efficiency and reduced energy consumption have come about neither as a result of government mandates nor the Energy Star program. For consumer electronics, technological innovation is the primary driver of energy efficiency. The energy

[2] http://www.energystar.gov/index.cfm?c=partners.intl_implementation

consumption of a typical 19- to 20-inch color television, for example, decreased from approximately 450 watts in the 1960s to less than 100 watts in 1995.[3] During the same period, major improvements in product reliability and performance also took place. For example, picture brightness increased seven-fold and picture tube phosphor efficiency increased by more than a factor of three.[4] There is ample reason to expect that industry innovation, including the natural trends toward energy efficiency in electronics design, will continue to yield energy savings and efficiency in consumer electronics, including digital televisions, going forward.

The Commission also should recognize that consumer use varies significantly with high tech products, which typically contain multiple features and functions that are used in many ways. Consequently, determining an average usage pattern is very challenging.

Now is not the right time for the Commission to revisit its decision to exclude televisions from the labeling requirements.

Considering the lack of an acceptable test procedure for digital televisions, and in recognition of successful voluntary initiatives addressing their energy use, pursuing a labeling program for digital televisions at this stage is not warranted. At this time, CEA urges the Commission not to revisit its decision to exclude televisions from the labeling requirements. We also urge the Commission to recognize that the existing DOE test procedures for televisions are an inappropriate basis for a labeling or other consumer information program related to newly developed television technology.

Respectfully submitted,

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[3] Testimony by Bernard J. Lechner on behalf of Electronic Industries Association at the U.S. Department of Energy's public hearing regarding the Energy Conservation Program for Consumer Products, June 7-8, 1994, pursuant to Energy Conservation Standards for Eight Types of Consumer Products rulemaking (59 Fed. Reg. 10464; March 4, 1994; Docket No. EE-RM-90-201).
[4] Ibid.